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ABSTRACT

The background of institutional accreditation in the United States is described, and its initial purposes outlined. The recent expanded uses of accreditation are attributed to several factors: the growth of specialization in all professional areas; the use of accreditation in determining eligibility for public funds; and pressures from minority groups on governments to provide for their participation in postsecondary education. These new uses are also categorized in four groups: (1) internal to institutional administration; (2) external; (3) professional; and (4) societal. Comments are made and questions asked about the future of accreditation. (MSE)

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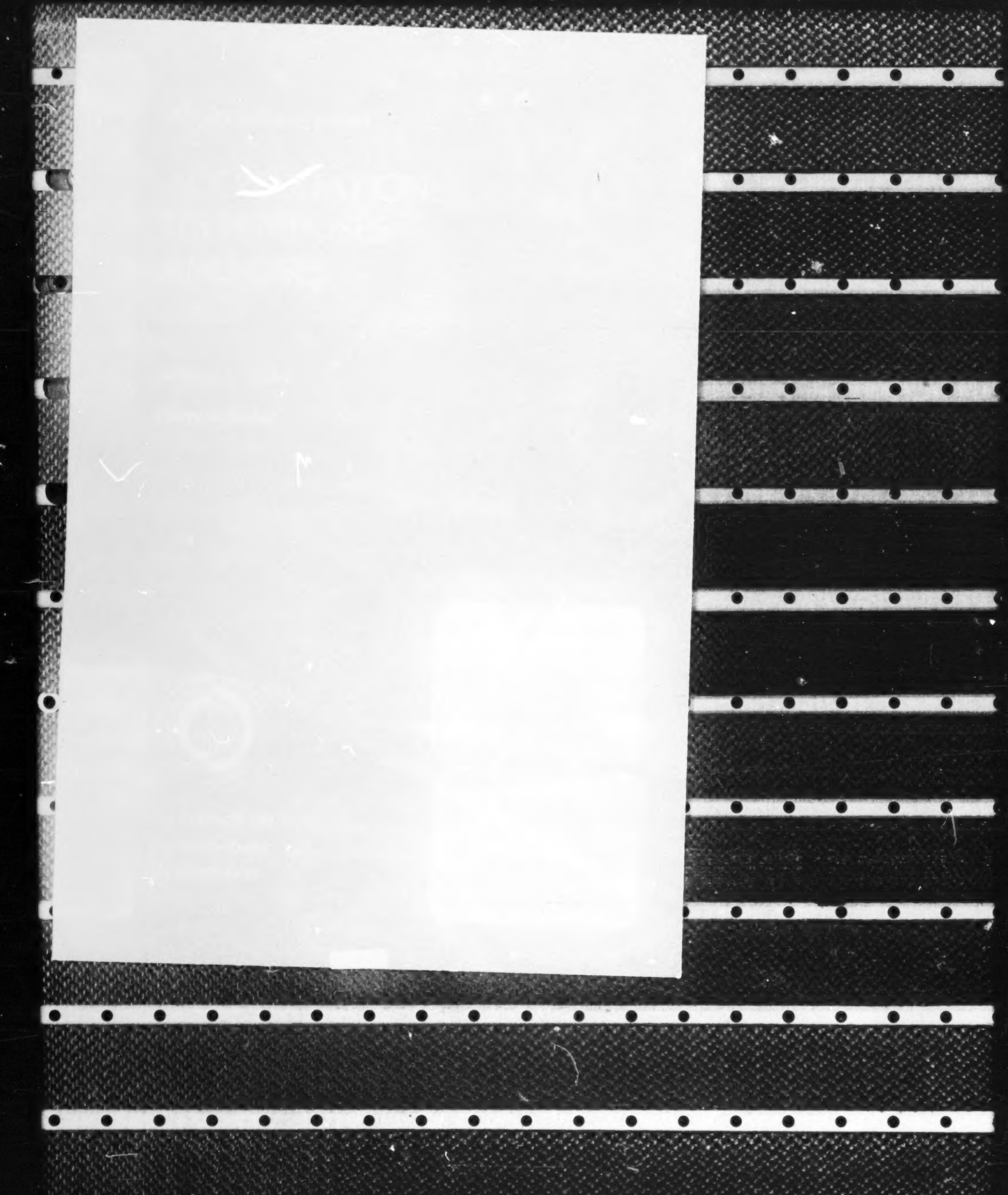

An occasional paper

ACCREDITATION: ITS PURPOSES AND USES

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About the Authors

William K. Selden and Harry V. Porter have drawn on their many years experience in postsecondary education and their direct involvement in accreditation in the preparation of this paper. Both are now "actively" retired. Mr. Selden was for many years Executive Director of the National Commission on Accrediting; Dr. Porter concluded his formal involvement as Executive Secretary of the Commission on Higher Education of the Middle States Association of Colleges and Schools, a regional accrediting association.

The views expressed and conclusions reached in this paper are solely those of the authors, but The Council on Postsecondary Accreditation is pleased to publish this addition to its series of Occasional Papers—a growing body of literature about educational accreditation.

WHY ACCREDITATION?

One of the primary methods for maintaining standards of education in the United States is accreditation. Through this process an agency or organization evaluates and recognizes an institution or program of study as meeting certain predetermined qualifications or standards, and issues a public statement to this effect.[1]

Accrediting agencies rely upon the educational institutions themselves to maintain their educational programs in such manner as to conform to standards that are applied by the agency after they are cooperatively developed. This method of developing and maintaining standards contrasts with the system which prevails in most other countries. Commonly, a ministry of education or similar government agency creates educational institutions and authorizes them to offer specified programs of instruction in accordance with standards established by the government. Such a system does provide a means for the more ready establishment of standards and for greater national uniformity.

The Constitution of the United States made no provision for such national involvement in education. Consequently, a decentralized system for maintaining educational standards came into being, and accreditation became an important element in this system.

A Prelude to Accreditation

A prelude to accreditation was introduced in 1787 when the New York State Board of Regents was required to visit every college in the state once a year and to report annually to the legislature. Since similar requirements existed in no other state, it became necessary many years later to develop a nongovernmental system of maintaining academic standards. Thus the process of voluntary accreditation evolved.

Various bodies such as the American Association of University Women, the University of Michigan, and the University Senate of the Methodist Episcopal

[1] Although some governmental agencies, such as the Regents of the State of New York, perform certain accrediting or certifying functions, the bulk of accreditation is performed by voluntary educational associations, and it is accreditation by these organizations which is addressed in this essay.

Church did perform certain functions similar to those later incorporated into accreditation, but the first bona fide accrediting activities were performed in the field of medicine. The initial list of classified medical schools was issued in 1906-07 by the Council on Medical Education of the American Medical Association. This major step laid the groundwork for the later closing of many schools which, in the opinion of the AMA, were offering inadequate training. It also prompted other schools to improve their educational offerings and strengthen their admission requirements. The Flexner Report in 1910 stimulated activity that led to rapid and significant changes in medical education.[2]

The American Bar Association took notice of the developments and a few years later followed the pattern of standard-setting established in medicine.

By the end of the 1920s, accreditation was initiated in such specialized fields as landscape architecture, library science, music, nursing, optometry, teacher education, and collegiate business education. There followed in the 1930s similar activity in chemistry, dentistry, engineering, forestry, pharmacy, social work, theology, and veterinary medicine. Today, more than fifty fields in postsecondary education are subject to specialized accreditation conducted through the direct or indirect involvement of several times that many national organizations and thousands of individuals.

The Beginnings of Institutional Accreditation

Institutional accreditation may be traced to the list of accredited colleges and universities issued in 1913 by the North Central Association of Colleges and Secondary Schools. The need for this type of accreditation occurred because of the lack of common standards among institutions calling themselves colleges or universities.

The Middle States, New England, North Central, and Southern regional associations initially were created to develop and maintain a method of articulation between the secondary schools and the colleges for admissions purposes. They soon discovered, however, that their informal procedures did not meet fully the needs of their members.

There evolved, therefore, a concurrent activity designed to protect the member institutions from competition by other institutions considered to be deficient, inadequate, or unethical, as determined by the inability of these institutions to meet requirements for membership in the associations.

To enforce their membership requirements it was natural that the associations eventually would require institutions seeking membership to be inspected and to meet certain established standards. Meeting these standards resulted in accreditation of the institution which, in turn, qualified it for membership. By the early 1950s, institutional accreditation was a requirement for membership in

[2] Abraham Flexner, *Medical Education in the United States and Canada* (Boston: D. B. Updyke, Merrymount Press, 1910).

each of the six associations of colleges and secondary schools that now, collectively, span the nation and its territories.

Initial Purposes of Accreditation

In both specialized and institutional accreditation the primary purposes of the sponsorship of this standard setting activity were:

1. establishment of minimum educational standards; and
2. insistence on the maintenance of minimum educational standards for protection of the public, the institutions, and their graduates.

Concurrent with and related to these two purposes was recognition of the need to assure comparable minimum educational preparation of the students being admitted to the institutions and to their specialized programs of study.

Recognizing that insistence on the maintenance of minimum standards merely for initial accreditation was insufficient, and prodded by the stronger institutions whose quality far surpassed minimum standards, the accrediting agencies later developed a third purpose for accreditation, and especially for re-accreditation; namely:

3. stimulation for continued self-improvement by the institutions and programs.

A fourth purpose or role of accreditation soon emerged; that of:

4. protection of institutions from improper external or internal pressures.

The threat of the loss or denial of accreditation has been sufficient in many cases to protect some colleges and universities from political interference on the part of injudicious or overzealous state officials and legislators.

THE INCREASED USES OF ACCREDITATION

Recently, the importance of accreditation has increased rather rapidly, as the uses to which it is put have been extended. The expansion of these uses, in contrast to the purposes for which accreditation was initially established, may be attributed to several factors:

1. There has been a significant growth in specialization in all professional areas, which has led to an enlargement in the number of individual professions.

2. Each of these newer professions has aspired to a position of respect and influence; and one of the attributes of such a position is greater control over the educational programs for its future members. This usually involves accreditation.

3. Government has been spurred to give greater recognition to accreditation as one means of identifying institutions eligible for receipt of funds to support educational programs and for targeting financial aid to students in those eligible institutions. The expansion of Medicare and Medicaid also has tended to increase the importance of accreditation, as one of the mechanisms employed to identify qualified practitioners.

4. The economic and social ferment of the times has taught minority groups that pressures on government also can encourage indirect pressures on accrediting agencies. In the view of some of these groups, accrediting agencies have done too little to provide for the participation in postsecondary education of women and individuals from minority groups.

It is possible to identify twelve uses to which accreditation has been put, three of which may be seen as basic, and the others as subordinate. They are grouped for initial examination in somewhat arbitrary categories entitled *Internal Uses*, *External Uses*, *Professional Uses*, and *Social Uses*.

The following observations, it should be noted, refer to postsecondary education programs and not to elementary or secondary education, nor to programs of a wide variety of service agencies (hospitals, speech and hearing clinics, and the like) which are not organized as educational institutions.

A. Internal Uses of Accreditation

Those uses of accreditation which are directed primarily to the accredited institution itself have been included in this first category.

A-1. *Identifying an Institution or Program of Study as Having Met Established Standards*—Postsecondary accreditation was initiated for the purpose of establishing minimum educational standards and identifying those institutions or programs of study that met these standards. It was begun at a time when no broadly accepted definition of a college existed (if it ever has) and when institutions of wide-ranging quality and with diverse characteristics called themselves colleges and universities.

When the presumably more qualified institutions banded together to form regional associations, and when they realized that they should publicize their memberships in order to provide some protection for themselves from institutions of inferior quality, they found it necessary to develop standards on which membership decisions could be based. Under conditions that then prevailed, quantitative standards (later so much criticized) provided the only practicable basis for judgment. Criteria were devised for the measurement of financial support, size and preparation of faculty, numbers of books in libraries, laboratory facilities, administrative personnel, and other institutional elements.

Reliance on these measures made their early application, as well as comparisons among institutions, relatively easy. Medicine, law, and the other professional fields relied on a similar approach as they initiated their separate accrediting programs. During the early years of accreditation of schools of medicine, for example, distinctions were made so that a school, if accredited, was placed in Class A or Class B, depending on the extent to which it met the criteria.

Lest it be assumed that accreditation evolved only for protection of the qualified institutions from those less qualified, it should be emphasized that one of its primary motives was to assist in the admission of students. The regional associations simultaneously undertook the identification of those secondary schools whose graduates normally would be considered acceptable for admission to colleges that were members of the association.

As time passed it became apparent that the mere meeting of quantitative standards did not necessarily assure that an institution or program of study was offering an educational program of quality. Criticisms of "conventional and arbitrary standards" abounded. In response, the first major study of accreditation was sponsored in the early 1930s by the North Central Association of Colleges and Secondary Schools. This project led to a revision in the basic approach to accreditation: to evaluate an institution in terms of its stated purposes. The implementation of this new evaluation concept was delayed until after World War II, at which time the Middle States Association of Colleges and Secondary Schools became the first to inaugurate the broad recommendations outlined in the North Central study.

This revised approach incorporated many improvements and has proved more flexible than the initial quantitative approach. At the same time it has been beset by its own set of issues. To illustrate, the new procedures depended more heavily upon the quality of the evaluating teams which visited the institutions, and upon the wisdom of the members of the committees and commissions responsible for the final decisions. As a consequence, these decisions, while presumably more valid, tended nonetheless to be more subjective than those in the past.

It should be noted that accreditation is a human process, requiring the dedication of many volunteers applying necessarily flexible standards to a wide variety of institutions and programs. In other words, it is a fallible method of identifying quality in education, employing gross techniques of measurement with imprecise standards. While needing constant examination and refinement, the process has nonetheless proved to be more desirable on several counts than proposed alternatives.

Accrediting agencies make no direct reference to, and pass no judgment on nonaccredited institutions or programs of study. They are concerned only with those institutions that seek to be accredited and, within them, essentially with their educational effectiveness. In October, 1972, the former Federation of Regional Accrediting Commissions of Higher Education issued a policy statement that contained the essence of what accreditation endeavors to provide; that is,

> [assurance] to the educational community, the general public, and other agencies or organizations that an institution has clearly defined and appropriate educational objectives, has established conditions under which their achievement can reasonably be expected, appears in fact to be accomplishing them substantially, and is organized, staffed, and supported so that it can be expected to continue to do so.

With the recent discussions about the future functions and uses of accreditation, it must be remembered that this activity has been supported primarily by the institutions for the specific purpose of identifying an institution or program of study as having met established standards and encouraging improvement of educational quality. Other functions and uses stem from these basic purposes.

A-2. *Assisting Institutions in the Determination of Acceptability of Transfer Credit*—One of the benefits sought in the early twentieth century standardization of postsecondary education through accreditation was an improvement in the admission of transfer students. It was assumed that students wishing to seek transfer of academic credit from one institution to another would be more successful if they had been enrolled in an accredited college or university. The presumption was one of the factors that led the Association of American Universities to become an accrediting agency for colleges whose graduates would then be given preference in their admission to graduate schools.

In 1944, however, a study conducted by Marcia Edwards under the sponsorship of the Carnegie Foundation for the Advancement of Teaching[3] demonstrated that "students from institutions accredited and not accredited by AAU" were doing "almost equally well in graduate schools." This analysis, plus a general disenchantment with their accreditation efforts of the past by the presidents of the AAU institutions, led that organization to discontinue its accrediting activities in 1948. Following this action, the Graduate Record Examinations and other indices of potential academic success were employed more widely in decisions for admission to graduate schools, and the accredited status of the college from which the student was graduated receded as a factor of general importance.

Although a similar situation now prevails with respect to acceptance of transfer credit for students, there still continues to be a residual reliance on accreditation in evaluating and granting undergraduate credit. Despite frequent reminders by accrediting agencies that they evaluate institutions and programs but not individual students and that a student's abilities should be judged by criteria other than the accredited or nonaccredited status of the institution attended, accreditation frequently continues to play a role in the determination of transfer credit. The view prevails that since accreditation does attest to the overall quality of an institution's educational offerings, it serves a valid purpose in evaluating transfer credit even if it does not address specifically the question of course-to-course equivalency.

A-3. *Encouraging the Involvement of Faculty and Staff in Institutional Evaluation and Planning*—Another internal institutional use or benefit from accreditation derives from the requirement that institutions undertake a process of self-study preparatory to the visit of an evaluation team. Judging the quality of an institution on the basis of how well it is fulfilling its stated goals, requires that the goals first be clearly defined and understood. Proceeding on the premise that a collegial atmosphere should prevail for an educational institution to be considered a college or university, the accrediting agencies have tended during the past thirty years to insist that educational goals must be cooperatively developed and implemented, not determined and dictated by any single element of the college or university.[4] The comprehensive self-study has grown to be an integral part of the entire accrediting process, and, as such, has become for some institutions its most significant element.

Although members of all organizations like to believe that they are reviewing constantly the effectiveness of the function and structure of their enterprises,

[3]Marcia Edwards, *Studies of American Graduate Education* (New York: Carnegie Foundation for Advancement of Teaching, 1944).

[4]This principle applies particularly to colleges and universities in the traditional sense. The organizational and staffing patterns of institutions such as correspondence schools often dictate different policy-making procedures. Consequently, the expectations of their accrediting bodies also differ.

some kind of stimulus usually is required to translate their assumption into action. Accreditation serves as one of the stimuli for such necessary cooperative reassessments, whether the institution is a small college, a large university, or a specialized institution.

Nongovernmental accreditation has been effective in promoting within educational institutions a spirit of cooperation and constructive self-examination. This spirit has nourished attainment of the fourth internal institutional use of accreditation.

A-4. *Creating Goals for Self-Improvement and Stimulating a General Raising of of Standards Among Educational Institutions*—The logical extension of institutional self-evaluation led the accrediting agencies to serve as catalysts for continuing improvement of individual institutions and their programs of study. It must be recognized that some institutions are stimulated to self-improvement only by the real or imagined threat of loss of accreditation. Even those which would acknowledge no such threat tend to be receptive to soundly based judgments of educational and professional peers, and hence are themselves moved to inprovement.

It is difficult to draw the line between the evaluative function of accreditation and its provision of advice and counsel. The accreditation process involves both; and many experienced evaluators believe that the most valuable service that can be performed by an evaluating team is that of critic and stimulator of educational improvement.

All institutions from the best to the weakest have gained to some degree from the contributions of peer review provided in a spirit of mutual cooperation. This may well be the most valuable service that a nongovernmental system of accreditation can provide to educational institutions.

B. External Uses of Accreditation

The distinction between internal and external uses of accreditation is not based on a clear-cut set of differences; the benefits cannot be precisely categorized one way or the other. The distinction in this essay is made on the basis of whether the use is *primarily* internal or external. Four uses of accreditation that primarily serve external institutional purposes are identified below.

B-1. *Assisting Prospective Students in Identifying Acceptable Institutions*—The numerous institutional and specialized accrediting agencies include in their memberships virtually every type of postsecondary institution and program. The standards and expectations of the accrediting bodies vary considerably, reflecting as they do a broad range of institutional and programmatic purposes and styles. Despite the lack of uniformity among the groups, accreditation does indicate that the program or institution has met the requirements of a particular accrediting body as to basic educational quality. It thus serves to provide prospective

students with assurance that the program or institution has met at least minimum standards for its particular kind of enterprise.

Given the variety and complexity of postsecondary education, no single organization or pattern of accreditation will ever serve all its elements, and no uniform standards of accreditation will ever be practicable. As the Council for Postsecondary Accreditation applies its provisions for membership to accrediting agencies, requiring them to meet certain expectations as to procedures and standards, and as the federal government, for its special purposes, continues to apply its criteria to many of these same agencies, the meaning of accreditation by such accrediting bodies will become clearer. Prospective students attempting to judge institutional quality will thus be further aided in their efforts. However, the sources of information will still be varied and the standards of quality of different types of institutions and programs will still reflect these differences, as they should.

B-2. *Helping in Identification of Institutions and Programs of Study for Investment of Private Funds*—For many private foundations and individuals the lists of accredited institutions provide a ready-made and easily available screening mechanism. The donors are in most cases unable to sift the funding requests they receive without recourse to some form of preliminary screening. The accreditation lists provide this initial assistance.

The most dramatic example of such reliance was provided in the early 1950s when the Ford Foundation decided to distribute some of its capital on a formula basis to all colleges and universities accredited by one or more of the regional associations. This decision was a surprise to the accrediting agencies which at no time had made efforts to encourage use of or reliance on accreditation for such purposes. On the other hand, the agencies have not objected to this practice since it has provided an additional incentive for institutions to seek accreditation. At the same time, the policies and practices of accrediting agencies have not been diverted from their purposes nor directly influenced by this use of accreditation.

B-3. *Providing One Basis for Determination of Eligibility for Federal Assistance*—In contrast to the use of lists for philanthropic purposes, a similar reliance by government has produced quite a different history and series of developments. These developments coincide with a much greater dependence by postsecondary education on the federal government for financial support in one form or another. Indeed, this dependence, more than any other factor, has increased the importance of accreditation in recent years.

The Servicemen's Readjustment Act of 1944 provided the impetus for this use of accreditation. The GI Bill of Rights, as it was commonly known, allowed millions of discharged servicemen to pursue their education at government expense. The provision was a great boon to the servicemen and to the colleges and universities, but it also stimulated the creation of some institutions whose ad-

ministrators and faculty members were better attuned to making money than to the ethics and goals of education.

The Veterans' Readjustment Act of 1952 addressed the issue of standards in educational institutions whose students would be eligible for federal assistance under the GI Bill. An early draft of the 1952 legislation placed responsibility with the Veterans' Administration. However, Congressional testimony by representative spokesmen for the postsecondary education community was effective in urging that the U.S. Office of Education be assigned the administrative responsibility for identifying eligible institutions.

In fulfilling this assignment the U.S. Commissioner of Education has employed the lists of institutions accredited by the nongovernmental accrediting agencies as one of the bases on which the eligibility of institutions for this and other forms of federal funding may be established. While giving recognition to the importance of the private sector in the overall governance of postsecondary education, the federal government reliance on accreditation has led to confusion between the distinct functions of accreditation and eligibility.

Its use as a major factor in the determination of eligibility has enhanced the importance of accreditation and the power of the accrediting agencies; and by using accreditation in this way the Office of Education also has increased its own influence.

Following enactment of the Higher Education Act of 1965, an Accreditation and Institutional Eligibility Staff (now the Division of Eligibility and Agency Evaluation) was created within the Office of Education and charged with the responsibility of analyzing more carefully and systematically the policies, structure, and operations of accrediting agencies that were seeking initial or renewed recognition.

Despite the presence of an Advisory Committee of nongovernmental personnel broadly representative of education and the public to review all such requests, the accrediting agencies, generally supported by the educational institutions, have reacted with increasing wariness to what they consider an incursion into their legitimate prerogatives.

This inevitable tug of war is the result of several factors:

1. Because of Constitutional provisions and our political heritage, the federal government has been permitted to act in matters relating to education only through indirect means, for example, the provision of funding to institutions that apply and meet specified requirements.

2. An indirect means by which the federal government has acted is through increased reliance on nongovernmental accreditation.

3. Despite this increased governmental reliance on accreditation, the accrediting agencies have been slow to recognize and implement their larger responsibilities to society in contrast to responsibilities defined in terms of needs of their members.

4. This tardiness of response on the part of the accrediting agencies has led the Commissioner of Education to use indirect pressures in insisting that accrediting agencies be oriented more towards the needs of society.

5. These developments have involved attempts to recast accreditation; to make it serve roles and functions for which it was not originally created, and which it may not be able or should not be expected to fulfill.

In the midst of these developments, Congress enacted the Education Amendments of 1972 which further affected accreditation. Among its provisions, this bill redefined "higher education" as "postsecondary education," enlarging the universe of institutions; it laid the basis for accountability in postsecondary education; and it mandated a stronger role for the states in coordination.

Enactment of these provisions has led some analysts to identify the development of a triad relationship among the federal government, the several states, and the nongovernmental accrediting agencies—the last now joined in a cooperative endeavor through the Council on Postsecondary Accreditation. The triad relationship is dynamic as each of the three components and their innumerable individual elements jockey for position and a definition of responsibilities that will meet their respective interests. The interests at present are not well defined.

The current conditions relating to postsecondary accreditation are at a stage of "fluid uncertainty." This uncertainty exists partially because of continued confusion between the uses of accreditation and the purposes or roles that it can appropriately and successfully fulfill. The uses and *appropriate* roles do not necessarily coincide.

B-4. *Serving as an Instrument for Enforcement of Policies Established by Civil Government*—A further development in the relationship of the federal government to accreditation has proved to be very disquieting to some social and educational analysts. This was an attempt—now declared by federal officials as no longer being made, although there is no assurance that it might not be resumed sometime in the future—to require accrediting agencies seeking official recognition by the Commissioner of Education to enforce policies of the federal government in accrediting educational institutions or programs of study. The specific example of such an effort related to admission policies for women to schools of medicine. It was contended by the government, although no documentation was offered to support this contention, that the educational quality of an institution would be strengthened by the presence of more women in medical schools. The federal policy to be enforced through accreditation was equal educational opportunity, and the ensuing confrontation was forced by zealous women's groups and minority interests.

Granting that a public policy of equal opportunity is socially desirable and sound, it is doubtful that it follows that accreditation is either an appropriate or an effective instrument for the enforcement of governmental policy.

C. Professional Uses of Accreditation

The most dynamic growth that has occurred in accreditation in recent years has been in the number of accrediting programs conducted by agencies concerned with professional or specialized fields of study. This growth is largely the result of increased specialization in the professions and other vocations, especially in the health fields, all of which consciously or unconsciously endeavor to emulate medicine. The profession of medicine has maintained a position of professional, social, and economic preeminence over a long span of years, and has done so partially by maintaining such activities as accreditation of its educational programs and certification of its qualified specialists. The appeal to the other professions and would-be professions is to go and do likewise. They perceive dual benefits from accreditation.

C-1. *Establishing Criteria for Professional Certification and Licensure*—The generally stated purpose for the establishment of a program of accreditation by a profession is to provide an element of protection: protection for potential students so that they may know which professional schools have met minimum standards; and protection for the public from unqualified practitioners who presumably might have obtained their training through an inadequate program of study. This latter protection, which also serves to protect the members of a profession, complements the activities of certification and licensure; both are control mechanisms intended to identify qualified individual practioners.

Because of common confusion regarding these separate and distinct operations it should be noted that:

> *Certification* is the process by which a nongovernmental agency or association grants recognition to an individual who has met certain predetermined qualifications specified by that agency or association, and
>
> *Licensure* is the process by which an agency of government grants permission to persons meeting predetermined qualifications to engage in a given occupation and/or use a particular title . . .[5]

In both certification and licensure it is frequent practice to stipulate that the candidate should be a graduate of an accredited school or program of study in order to be eligible to sit for the qualifying examination. By this method total reliance for identification of qualified practitioners is not placed either on graduation from an approved or accredited *program*, or on successful completion of qualifying examinations. The combination of accreditation, certification, and licensure provides a series of screening mechanisms.

As contrasted with institutional accreditation, in which reliance has been placed on the evaluation of those features of an educational institution that

[5] *Study of Accreditation of Selected Health Education Programs*, Commission Report. (Washington: National Commission on Accrediting, 1972).

seem to assure quality in education, accreditation of specialized programs of study employs as part of its evaluative procedure reference to the successes of the institution's graduates on certifying and licensure examinations. In other words, there is much greater opportunity to measure outcomes and to employ this measurement as one of the qualifications for accreditation.

At the same time there is a fallacy in this approach since a school might more easily gain accreditation because it has developed a successful method of preparing its students to pass the licensure examinations without necessarily providing them with a broader education essential for their later professional responsibilities.

All three of the mechanisms have been operated under the control of the various professions. Even though licensure is a governmental function, state licensure boards have until very recently been composed only of members of the respective professions. Such interlocking relationships have strengthened the influence of the professions in another use or role of accreditation, to be mentioned next.

C-2. *Serving as a Means for Specialized Groups to Gain Increased Support for Their Programs of Study*—In seeking to undertake accreditation or to institute certification and licensure, every profession insists that these operations are necessary for the protection of the public. Without doubting the sincerity of these contentions, one may also recognize that the motivating force is usually some form of benefit to the members of the profession.

For sixty years it has been asserted that the quality of professional education is usually improved when offered in a university setting and not in a separate, specialized school or college. However, in such collective settings each professional program of study must compete for funding and support with all the other educational offerings of the institution. Those programs that are subject to specialized accreditation have a means of increased leverage to attain their individual goals. No more open admission of this fact can be cited than the statement quoted in the March 26, 1976, issue of *The New York Times*. It was reported that the dean of the college of veterinary medicine at Cornell University "hoped the college was placed on probation [by the veterinary accrediting agency] because this would put the State under 'extreme pressure' to approve additional funds to correct the deficiencies." The deficiencies stated in the article were improved facilities and a better faculty-student ratio, at an estimated cost of $1.2 million. Without doubting the possible need for such improvements, one must ask what adverse influences such pressure exerts on the many educational programs for which there is no specialized accreditation and which may have equally pressing needs.

The function of accreditation of specialized programs of study is being questioned increasingly as part of the general public and governmental review of controls established and maintained by the professions. In the past, when education was vocationally less important and financially less significant, the public

was indifferent to the extent of influence and control that the professions exerted over the programs of education for their future members. This difference is now giving way to widespread concern that the professions collectively are not according sufficient recognition to the broader needs of society in their endeavors to maintain quality in education, as well as protection of their own special interests. The widespread credibility gap that currently affects all activities has not left the professions unscathed.

Recent clamor by some members of the clinical psychology and pharmaceutical professions for reductions in the numbers of students admitted to their respective educational programs serves as an example of desires by members of the professions for influence in accrediting decisions. This example is reminiscent of the earlier criticisms of the medical profession for presumably restricting educational offerings in order to limit competition among physicians. Government officials in the Division of Eligibility and Agency Evaluation of the U.S. Office of Education, the Federal Trade Commission, the General Accounting Office, and other agencies are now scrutinizing activities of the professions with enhanced public support.

The future of specialized accreditation may also be substantially influenced by the growing unionization of members of the health professions. There is a question whether or not society will continue to accord to professions the privilege of establishing and maintaining their own academic standards and their own admission requirements, when the professions are being organized to exert political and social pressures to protect their economic interests and even extend their areas of jurisdiction of practice.

D. Societal Uses of Accreditation

In this essay frequent reference has been made to such considerations as protection of the public and protection of students. These are benefits for society, and they should be recognized as such. On the other hand, there are two additional societal uses or benefits accruing from accreditation that pertain more particularly to the structure of our society and the balance of forces in our body politic.

D-1. *Protecting Institutions Against Harmful External and Internal Pressures*—In our open, democratic society we have held to the tenet that our colleges and universities should be permitted a high degree of independence in order that freedom of thought may prevail, that freedom of inquiry may be untrammeled, and that academic freedom may be maintained. Such academic freedom is believed to be essential so that professors, teachers and learners may pursue their investigations wherever they may lead. Consistent with this philosophy, accrediting agencies have provided support to institutions whose freedom of operations have been unduly threatened. In some cases where attempts have been made to undermine educational freedom, the threat of withdrawal of accreditation has

been sufficient to blunt or divert the attack; in other cases, the removal of accreditation for a period of time has been required. In all such situations the intent of the accrediting agencies has been to maintain the viability of an educational institution free from external dictation or manipulation.

D-2. *Serving as an Integral Part of the Balance of Forces Exerting Control over Postsecondary Education*—The political structure of the United States is based upon a balance of forces among the executive, judicial, and legislative branches of government, and among the several levels of federal, state, and local governments. What should not be overlooked is the equally important need in a democracy for a functioning balance between governments and the private sector. It is in this context that accreditation may in the future be able to make one of its more significant contributions. To do so, it must do well those things for which it is well suited and not be tempted or forced to undertake tasks, however commendable, for which it is not well-suited.

The accrediting agencies must take pains to define their responsibilities, to be alert to the social implications of their policies, and to review continually their expectations and procedures. They also must work with the two other components (state and federal agencies) of what has been termed the "triad" to define and to delimit roles in this three-cornered relationship. Private accreditation must be prepared to cooperate with state and federal agencies in facing mutual problems. However, for the sake of the benefits to be derived from the balance of forces, the accrediting bodies must also be prepared to serve as an independent countervailing force and to resist efforts either to deny them their proper role or to extend their responsibilities beyond proper bounds.

NEW PRESSURES ON ACCREDITATION

A variety of forces, some internal to the educational community and some external, have tended in recent years to overextend or misdirect the efforts of the accrediting bodies. These forces include:

- Emerging and developing professions which seek protection for their fields of education and practice or which see in accrediting activities a route to enhanced professional and social status.
- Government agencies which rely on accrediting agencies to perform an initial screening for the identification of institutions and programs for various government purposes; and representatives of the public, or government agencies, that see accreditation as an aid to enforcement of governmental regulations.
- Sponsors of institutions or programs of institutions who want the identification of accreditation, often for unconventional institutions and programs which need a stamp of approval in order to gain public acceptance.
- Minority and other groups that want accrediting procedures to assist in the achievement of their goals.
- Individuals from these first four groups and from the general public who attach undue importance and who ascribe undue powers to accreditation.

Appropriate Purposes and Uses of Accreditation

These pressures toward overextension and misuse of accreditation serve to raise anew the question of what accreditation's appropriate purposes and uses are. An attempt to answer this might well begin with a reminder of several basic characteristics of the American accreditation process.

Accrediting bodies are membership organizations, funded by their membership. They operate with limited budgets. Further, members are responsible for the development of their own programs, and these programs are judged by criteria cooperatively developed.

The accrediting bodies are voluntary in origin and operation, and while the recognition which they grant and the sanctions which they can apply are often significant and even crucial, accrediting agencies are not in any sense arms of government. Furthermore, accreditation is completely separate from those governmental responsibilities for licensing and ceritifying which authorize institutions to be established.

It is well to note that the work of evaluation is conducted by paid staffs of minimal size and by unpaid volunteers from member institutions.

If only for the reasons suggested above, accreditation does not provide continuous supervision or review. It is, rather, an assessment of an institution or program at a given time, resulting in a statement as to its educational effectiveness at that time and to its promise of continuing effectiveness. Such assessments are reviewed periodically; but the process does not provide continuous oversight.

Given these characteristics, accrediting agencies are particularly well suited to serve certain limited purposes effectively. They include:

- Identifying institutions and/or programs of study that meet minimum standards.
- Stimulating the raising of standards, and the related activity of encouraging educational improvement.
- Assisting in the protection of institutions and/or programs of study against internal or external deleterious forces.

In respect to the first purpose mentioned, the tangible evidence of accreditation is a list of institutions or programs that the accrediting agency publicly identifies as having met its minimum standards. These standards generally are embraced in the criteria mentioned earlier and include appropriate educational objectives, conditions conducive to their achievement, evidence of their achievement, and assurances of stability.

As for the stimulation of improvement, not only is the improvement of education a direct aim of accreditation, it is also a frequent by-product of the process itself. The cooperative participation of faculty members, administrative staff, trustees, and students in the reviews and self-studies serves as a catalyst for institutional self-improvement. Peer review by volunteer accreditors assists this process and also provides a means for the wider dissemination of information about educational development.

The function of protection is one infrequently involved but nonetheless significant. Although accrediting bodies have no means for direct restraint of those who would interfere with the educational process, the sanctions implicit in

the process of accreditation have served effectively on occasion to deter those forces, political or other, which would interfere with the educational process.

These purposes are limited in their scope, and they need to be. However, they are by no means simple or unsubstantial. They are in fact difficult to translate into action, costly in time and energy, and crucial to the world of postsecondary education. It should be emphasized that the accrediting agencies have their hands full carrying out the limited but complex duties dictated by the fulfillment of these three purposes alone.

Establishing standards and evaluating educational quality are difficult and elusive undertakings. What may be a fairly direct and concrete task in accrediting a technical training program becomes a strikingly different problem when the complexities and intangibles of a large college or university are involved. Measuring educational effectiveness has always posed a major problem for both institutions and accreditors and it is not becoming simpler.

The task of accreditation has been complicated in recent years by the rapid proliferation of "non-validated" institutions and programs. Some of these reflect new methodological approaches, some are designed to broaden educational opportunity, and some seem to be products of simple entrepreneurial ingenuity.

While these undertakings differ widely in purpose and operation, almost all have something in common: they seek accreditation. Fortunately for those who face the problem of evaluating these nontraditional offerings, most of their sponsors wish to see their students' efforts, no matter how different in form and procedures, translatable into familiar academic credit. While this somewhat simplifies the accrediting task, educational institutions, accrediting bodies, and other educational organizations alike face a sizeable and serious problem in devising mechanisms for evaluating many unfamiliar patterns of education. The traditional means of evaluating are not irrelevant; but they need substantial supplementation if accreditation is to continue to meet its obligations.

Some New Questions

The stated functions of accreditation embrace other problems as well. To illustrate:

- How best can accreditation cope with the proliferation of satellite educational operations in the form of branch campuses and scattered centers of postsecondary education, often only loosely controlled by parent institutions?
- How can the accrediting community best work with other educational organizations in the development, recognition, and use of such new devises as credit banking and credit by examination?
- How should accrediting agencies deal with the problem of financial health of institutions in these days of rising costs and falling enrollments?

- What tests should educational institutions meet, in seeking accreditation or re-accreditation, to warrant confidence in their stability and continuity?
- How can the accrediting process be used to encourage and refine the measurement of educational outcomes?
- To what extent, and in what areas, is it feasible for accreditors to expect specific evidence of results, in both simple and complex institutions, as a measure of educational quality?
- To what degree may confidence still be placed in such familiar criteria as institutional structure, conditions of learning, and support as indicators of educational effectiveness?

Such are the nature and difficulty of illustrative problems that the accrediting agencies face within the bounds of their basic purposes. However, boundary lines in endeavors of this sort are never as clear-cut as one would like. And, as desirable as it is to delimit sharply the responsibilities of accreditation, there are grey areas which it can hardly refuse to debate. To choose as one of the more problematic: What responsibilities do accrediting agencies have in the matter of consumer protection, surely a legitimate subject of public concern? Despite the fact that accreditors cannot serve as enforcers of governmental regulations, do they have an obligation to do more than they are now doing to assure the public that their members follow clear and comprehensive codes of good conduct, codes which would embrace many principles of consumer protection? Should accrediting agencies cooperate with other educational organizations to develop, establish, and enforce such codes?[6]

The Role of Accreditation

Accreditation plays a distinct and significant role in American postsecondary education, and although nongovernmental in its function and authority, it serves important public uses.

By the nature of their origins, structure, processes, and support accrediting agencies are well suited to carry out functions bearing particularly upon the identification, improvement, and preservation of educational quality. To achieve these purposes the accrediting bodies need to be reasonably independent, and this independence must include the right *not* to undertake tasks, however worthy, for which they are ill-suited or which they cannot adequately support.

Those outside its range of control often put accreditation to uses for which it is not designed. This doubtless will always be true. However, the uses to which it may be put must not be confused with the purposes and responsibilities which it should be expected to sustain.

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[6] A joint project of the American Council on Education and the Council on Postsecondary Accreditation is underway to investigate this issue.

Accreditation must play a cooperative and significant role in the triad of state, federal, and private relationships bearing upon postsecondary education. At the same time it needs a substantial degree of freedom from governmental influence in order to play an equally important role as a balancing or countervailing force.

The accrediting community must continue to refine its purposes, clarify its responsibilities, and improve its processes. These are substantial tasks. Furthermore, it needs to examine carefully its social role; but it must, if it is to be effective in meeting its most important objectives, resist both the temptations and the pressures to reach beyond its capabilities.

OTHER PAPERS IN THIS SERIES

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Accreditation and the Public Interest, by William K. Selden; 20 pp., $1.50. One of the more prolific writers on the topic of accreditation—as well as a long-time "friendly critic" of the process—adds this important paper to the literature. Long an advocate of greater public involvement in accreditation, Dr. Selden in this paper traces some of the historical and philosophical trends that now seem to mandate such involvement and makes recommendations as to how public representatives might be chosen to serve on accrediting commissions, boards, and committees. (June 1976)

Confidentiality and Accreditation, by Louis H. Heilbron; 36 pp., $2.50. Mr. Heilbron, a COPA public Board member, is an attorney at law who has written extensively on educational matters, particularly in the field of governance. In this paper he explores the legal implications of the confidential procedures inherent in the accrediting process. One of his conclusions urges accrediting agencies to restudy their procedures with respect to records and meetings to be certain that they are as open to public scrutiny as the essential purposes of accreditation permit. (July 1976)

Respective Roles of Federal Government, State Governments, and Private Accrediting Agencies in the Governance of Postsecondary Education, by William A. Kaplin; 31 pp., $2.00. This report by a respected legal scholar knowledgeable in accreditation explores the current and future status of the education "Triad" inherent in the title with particular reference to determining eligibility for federal funds. (July 1975)

Educational Auditing and Accountability, by Fred F. Harcleroad; 36 pp., $2.00. Dr. Harcleroad reports on developments in the field of voluntary accreditation and the applicability of auditing systems to the evaluation of the success of educational institutions in meeting "generally accepted educational standards." Examples of an "educational prospectus" similar to an SEC disclosure prospectus, as well as an auditor's "letter of opinion," are included. (August 1976)

Academic Collective Bargaining and Regional Accreditation, by Robert S. Fisk and E.D. Duryea; 34 pp., $2.50. Two experts on the subject assess the impact of academic collective bargaining on the process of regional accreditation and on the various aspects of the institution that are central to accreditation—resources, organization, personnel administration, academic program and student experience.

In Preparation

How the Triad Should Work (tentative title), by Richard Fulton, former Executive Director and now General Counsel of the Association of Independent Colleges and Schools. Mr. Fulton originally conceived and promoted the "triad of responsibility" concept in testimony before various Congressional committees. He will attempt in his paper to outline the appropriate areas of responsibility for each element of the triad. (Available Spring 1977)

None of these Occasional Papers and the conclusions and recommendations they contain necessarily represent an official viewpoint of the Council on Postsecondary Accreditation. They are written to stimulate discussion; some are provocative, some may be controversial, others may be primarily historical. All are intended to add to the literature of accreditation which has been all too sparse. From such writings, future policy might be enhanced. In the spirit of scholarship, COPA is pleased to publish this series and make the papers available at cost to all its constituents and other interested parties.